

Atty. Docket No. JP920000133US1
(590.074)

REMARKS

Applicants and the undersigned are most grateful for the time and efforts accorded the instant application by the Examiner. At the time of the Office Action dated October 23, 2007, claims 1-6, 8-12, 14-20, 22 and 23 were pending and rejected; the rejection being made final. Of the presently pending claims, claims 1, 4, 8, 9 and 14-20 are independent claims; the remaining claims are dependent claims. In response, Applicants have filed a Request for Continued Examination and this Amendment. Applicants respectfully request reconsideration and withdrawal of these rejections.

Applicants are not conceding in this application the claims amended herein are not patentable, as the present claim amendments are only for facilitating expeditious prosecution. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications. Applicants specifically state no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Rejections under 35 USC 103(a)

Claims 1-6, 8, 9, 14-20, 22, and 23 stand rejected under 35 USC 103(a) as being unpatentable over Chelba et al., *Exploiting Syntactic Structure for Language Modeling*, Proceedings of Association for Computational Linguistics, Vol. ACL-36, Montreal, 1998, (hereinafter "Chelba") in view of Dekai et al., *An Information-Theoretic Empirical Analysis of Dependency-Based Feature Types for Word Prediction Models*, EMNLPVLC-99, pp. 138-47, 1999 (hereinafter "Dekai"). Claims 10-12 stand rejected

Atty. Docket No. JP920000133US1
(590.074)

under 35 USC 103(a) as being unpatentable over Chelba in view of Dekai and further in view of Kuhn, *Speech Recognition and the Frequency of Recently Used Words: A Modified Markov Model for Natural Language*, 12th International Conference on Computing Linguistics (COLING-88), Budapest, 1988 (hereinafter "Kuhn"). For the following reasons, the Applicants respectfully submit the invention as presently claimed is fully distinguishable and non-obvious over the cited references.

As the Examiner is aware, to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 there must be: (1) a suggestion or motivation to modify a reference or combine references; (2) a reasonable expectation of success in making the modification or combination; and (3) a teaching or suggestion to one skilled in the art of all the claimed limitations of the invention to which the art is applied. See In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Applicants have taken great pains to fully disclose and explain the novelty of the present invention in view of the Chelba reference at the heart of the present rejections. For the sake of brevity, the remarks submitted in the last Amendment, dated July 20, 2007, equally applicable here, are incorporated by reference.

The Examiner indicates that the previous claim language did not support the features upon which Applicants remarks relied upon in the previous Amendment. Without specifically addressing the merits of the Examiner's position as to the claim language or the teachings and/or suggestions of the prior art, Applicants have amended the independent claims to recite, *inter alia*, "predicting said target word based only on said word and/or said word sequence that is selected." Claim 1 (emphasis added). The

Atty. Docket No. JP920000133US1
(590.074)

remaining independent claims contain similar language. This language is intended to clarify that, in stark contrast to the teachings of the references cited by the Examiner (i.e., Dekai, Chelba and Kuhn) against the claims, the instant invention does not take the preceding word into account in the prediction if it has no modification relationship. Furthermore, Applicants respectfully submit that this claim language clearly indicates the features upon which the previous remarks, *inter alia*, rely upon.

For the aforementioned reasons, the Applicants respectfully submit, at a minimum, the prerequisite teaching/suggestion and expectation of successes required to maintain an obviousness rejection is lacking, indicating the claimed invention is not obvious under 35 U.S.C. § 103(a). Furthermore, Applicants submit that the cited references do not teach the limitations of the claimed invention, either alone or in combination, as discussed above.

Request for Telephone Interview

Applicants respectfully request that the Examiner kindly contact the Applicants' representative at the below listed telephone number to conduct a telephone interview in the event that the claims as presented herein are not in condition for immediate allowance. The Applicants respectfully submit that this is a particularly appropriate request in light of the prosecution history of this application, in which several amendments have been submitted, an RCE has been requested, and further amendments have now been submitted.

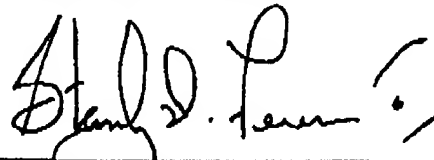
Atty. Docket No. JP920000133US1
(590.074)

Conclusion

In view of the foregoing, it is respectfully submitted that independent claims 1, 4, 8-9, 14-20, 22 and 23 fully distinguish over the applied art, are directed to patentable subject matter, and are thus are in condition for allowance. By virtue of dependence from what are believed to be allowable independent claims, it is respectfully submitted that claims 2-3, 5-6, 10-12, as well as new claims 22 and 23, are also presently allowable.

In summary, it is respectfully submitted that the instant application, including claims 1-6, 8-12, 14-20, 22 and 23, is presently in condition for allowance. Notice to the effect is earnestly solicited. Again, the Examiner is respectfully requested to contact the undersigned by telephone prior to the issuance of an Office Action if there are any further issues in this application.

Respectfully submitted,



Stanley D. Ference III
Registration No. 33,879

Customer No. 35195
ERENCE & ASSOCIATES LLC
409 Broad Street
Pittsburgh, Pennsylvania 15143
(412) 741-8400
(412) 741-9292 - Facsimile

Attorneys for Applicants